UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
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Reply To
Attn Of: ECL-116

Date: December 3, 1999

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To: See distribution on last page

SUBJECT: POLREP 1 for TAYLOR LUMBER AND TREATING, INC.
Removal Action, Sheridan, Oregon

II BACKGROUND

Site No.:	10F1
Action Memo Status:	September 28, 1999
Delivery Order:	PRP Lead
NPL Status:	Not listed
Response Authority:	CERCLA
State Notification:	Oregon Department of Environmental Quality notified
Response Start Date:	November 29, 1999
Completion Date:	Unknown
Incident Category:	Removal Action

The Taylor Lumber and Treating, Inc. (TLT) site, located in Sheridan, Oregon, is a wood-treating facility that manufactures lumber, wooden telephone and electrical power poles, pilings, and railroad ties. The preserved products (poles, pilings, and railroad ties) are coated with either creosote or pentachlorophenol (PCP) solutions. P-9 oil (petroleum products) is also used in conjunction with PCP. In previous years, the facility used a chrome, copper, and arsenic (CCA) solution for preservation. Operating practices and spills have resulted in contamination of surface soil, subsurface soil, and groundwater. Contamination has migrated off site via ditches on the perimeter of the property and via air releases.

Several investigations have revealed widespread surface soil contamination (especially arsenic), contamination of sediment in ditches and groundwater contamination. An EPA Listing Site Inspection was conducted in 1990, RCRA Facility Inspections were conducted in 1991 and 1996, and an EPA Integrated Assessment is in progress. Several residences are located within ¼ mile of the facility and ditches lead to the South Yamhill River several hundred feet south of the facility.
The South Yamhill River is habitat to for anadromous fish, including Coho Salmon and Steelhead Trout.
Other recreational species include Largemouth Bass, Bluegill, Crappie, and Channel Fish. Groundwater contamination, roughly 20 feet below ground surface, consists of a

product layer one to several feet thick resting on siltstone. The product layer is migrating toward the Highway to the south of the facility and the South Yamhill River.

III SITE INFORMATION

A. Incident Category: The CERCLIS ID number for this site is ORD009042532.

B. Site Description

Areas of the site that will be addressed during the removal include surface soil contaminations, surface water runoff, contaminated ditches, and groundwater contamination. Surface soils have varying degrees of arsenic, PCP and creosote contamination. Soils that contain more than 300 ppm of arsenic shall be removed or capped. Surface water transports contaminated surface soils to ditches which transport materials to the South Fork of the Yamhill River. Groundwater is contaminated with a layer of dense non-aqueous phase liquid product (DNAPL) containing PCP, creosote, and oil.

Removal Activities have been divided into two phases.

Phase I consists of the following activities:
1. Prevention of off-site migration of contamination via surface water runoff. This objective will be conducted by modifying grading and maintaining french drains and water separators.
2. Excavating of arsenic hotspots (>300 ppm).
3. Staging of contaminated soils.
4. Placing an asphalt cover over certain contaminated soil.

Phase II will consist of soil treatment or disposal and groundwater remediation. Consequently, during phase I tasks and evaluations for phase II activities will be conducted.

C. Situations

November 29-December 3, 1999

<u>November 29, 1999 (Monday)</u>

Personnel on site: OSC, 1 USCG, 1 START, 3 ERRS
Weather: Partly cloudy, rain showers, temperature in the 40's (high in the 50s)
Mobilization, and met with TLT to discuss work that TLT would be conducting in this phase.

<u>November 30, 1999 (Tuesday)</u>

Personnel on site: OSC, 1 USCG, 1 START, 3 ERRS

Weather: Partly cloudy, rain showers, temperature in the 40's (high in the 50s)

Started cleaning of french drains, and graded areas to keep runoff routed through oily water separators. Worked on disposal plan. The NW corner of the treating site near the west end of the north french drain was raised with ¾ minus crushed rock and graded to prevent stormwater from flowing from the site. The area was raised in 6-inch lifts and compacted.

The NE corner of the treating site near the east end of the north french drain was raised with ¾ minus crushed rock and graded to prevent stormwater from flowing from the site. The area was raised in 6-inch lifts and compacted.

Maintenance was performed on the french drain on the eastern side of the treating site (from the southern end of the dryer to the northeast corner of the site) and the northern side of the treating site (with the exception of areas where solid piping is used instead of perforated piping) to increase efficiency. Several inches of drain rock were removed from areas that appeared clogged or dirty. New drain rock was installed and mounded approximately 6-inches above the surrounding ground surface to increase the stormwater capture efficiency and to allow for compaction by vehicles. The french drain was tested by adding water from the Taylor water truck in several locations along its length. A catch basin was installed at the northwest corner of the dryer as an additional measure to prevent stormwater from flowing offsite through the dryer tracks. The new catch basin flows into the french drain next to the dryer.

<u>December 1, 1999 (Wednesday)</u>

Personnel on site: OSC, 1 USCG, 1 START, 3 ERRS
Weather: Partly cloudy, rain showers, temperature in the 40's (high in the 50s)

Completed cleaning one section of french drain. Testing showed system was working properly. Installed catch basin in low area near pole dryer to prevent direct off site flow. Sucked out and cleaned catch basin of TLT oily water separators and drainage piping. Pipe between catch basin and oil water separator ¾ full of sediment. Continued grading low areas to prevent direct runoff. Worked on Disposal Plans and preparing for next phase.

<u>December 2, 1999 (Thursday)</u>

Personnel on site: OSC, 1 USCG, 1 START, 3 ERRS
Weather: Partly cloudy, rain shower (heavy at times), temperature in the 40's (high in the 50s)

After further inspection to ascertain the condition of the southern section of the french drain which is located on the eastern side of the treating site, it has been determined that the french drain appears to be in good condition, but does not appear to be efficiently intercepting surface water runoff. Since this section of french drain does not appear to be operating efficiently, Taylor Lumber will add a small asphalt berm and a series of catch basins to prevent stormwater from leaving the site. Once this is completed, the french drain will no longer be required.

D. Next Steps

1. Install additional catch basins and berms.
2. Screen soils
3. Evaluate groundwater data
4. Install monitoring wells.
5. Conduct soil sampling.
6. Ditch excavation.
7. Determine disposition of soils.

Taylor Lumber will construct a small earthen berm along the western edge of the incisor area as an interim measure to augment the french drain. Imported material will be used to construct the berm. The berm will direct stormwater into a catch basin that will be installed at the same time. Water collected in this catch basin will be pumped into the oil/water separator at Outfall 002. Taylor some minor grading to route stormwater to the berm mavbe done.

Taylor Lumber will be preparing the Ditch Excavation Plan, and the plan for replacing the tracks at the entrance to the retorts. In addition, Taylor Lumber's contractor, SUMCO, will begin ordering materials for the stormwater conveyance system.

IV COST INFORMATION

Estimated costs are summarized below:

	Established Ceiling	Estimated Costs (As of 12/03/99)
START	$170,000	$52820.84

EPA	$10,000	$ 2,000
USCG	$50,000	$3369
ERRS	$886,200	$104,500
TOTAL	$1,116,200	$166,689.84

V DISPOSITION OF WASTES

The following wastes are staged on site as of December 2, 1999. This is the existing waste which was staged from a spill cleanup which concluded in late November 1999.

Soil: Treating Yard 1,700 cubic yards

VI DISTRIBUTION

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